

WILLIAM K. HARRINGTON
UNITED STATES TRUSTEE, REGION 2
U.S. Department of Justice
Office of the United States Trustee
Alexander Hamilton Custom House
One Bowling Green, Room 534
New York, NY 10004
Tel. (212) 510-0500
By: Mark Bruh
Trial Attorney

Hearing Date: November 21, 2024
Hearing Time: 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
In re	:	Case No. 24-22851 (SHL)
	:	
94 HUDSON PARK RD LLC,	:	
	:	Chapter 11
	:	
Debtor.	:	
-----X	:	

**NOTICE OF THE UNITED STATES TRUSTEE’S MOTION TO DISMISS THIS
CHAPTER 11 CASE, OR IN THE ALTERNATIVE, TO COVNERT
THIS CASE TO A CASE UNDER CHAPTER 7**

PLEASE TAKE NOTICE that upon this Notice of Motion and the accompanying memorandum of law, the United States Trustee for Region 2 (the “United States Trustee”), will move this Court before the Honorable Sean H. Lane, Bankruptcy Judge, in the United States Bankruptcy Court, Southern District of New York, 300 Quarropas Street, White Plains, New York 10601 on **November 21, 2024 at 10:00 a.m.** (the “Hearing”), or as soon thereafter as counsel can be heard, for an order pursuant to 11 U.S.C. § 1112(b) dismissing the chapter 11 case of 94 Hudson Park Rd LLC, or in the alternative, converting this chapter 11 case to a case under chapter 7, and for such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that the Hearing will be held via Zoom for Government. Participants are required to register their appearance by 4:00 p.m. the day before the

Hearing by utilizing the Electronic Appearance portal located on the Court's website at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>.

PLEASE TAKE FURTHER NOTICE that any responsive papers should be filed with the Court and served on the United States Trustee via email, attention: Mark Bruh, Esq. (mark.bruh@usdoj.gov), no later than seven (7) days prior to the return date set forth above. Such papers shall conform to the Federal Rules of Civil Procedure and identify the party on whose behalf the papers are submitted, the nature of the response, and the basis for such response. Failure to provide this information may be grounds to strike the response or to grant the motion by default.

Dated: New York, New York
October 29, 2024

Respectfully submitted,

WILLIAM K. HARRINGTON
UNITED STATES TRUSTEE

By: /s/ Mark Bruh
Mark Bruh
Trial Attorney
Office of the United States Trustee
Alexander Hamilton Custom House
One Bowling Green, Room 534
New York, NY 10004
Tel. (212) 510-0500